

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY CASES

Master Docket No.12-12052-FDS

This Document Relates To:

LISA WEINSTEIN,)
)
Plaintiff,)
)
vs.)
)
NEW ENGLAND COMPOUNDING)
PHARMACY, INC., d/b/a New England)
Compounding Center, AMERIDOSE LLC,)
MEDICAL SALES MANAGEMENT INC.,)
BARRY CADDEN, LISA CONIGLIARO)
CADDEN, GREGORY CONIGLIARO,)
DOUGLAS CONIGLIARO, CARLA)
CONIGLIARO, and GLENN A. CHIN,)
)
Defendants.)

**MEMORANDUM OF LAW IN SUPPORT OF ASSENTED TO MOTION FOR AN
EXTENSION OF TIME TO MARCH 31, 2013 TO RESPOND TO PLAINTIFF'S
COMPLAINT**

NOW COME defendants Barry Cadden, Lisa Conigliaro Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro, and Glenn A. Chin (collectively, "Defendants") and move this Court for an extension of time to March 31, 2013 for Defendants to answer or otherwise move. In support of the motion, Defendants state as follows:

1. On or about November 12, 2012, this action was filed in this Court.
2. Plaintiff and Defendants have agreed that the Defendants' response to the Plaintiff's Complaint will be due by March 31, 2013, as Defendants' counsel requires additional time in order to evaluate the allegations in the Complaint and prepare a full and adequate response on behalf of each Defendant.

3. Defendants are not seeking an extension to unduly prolong these proceedings and no prejudice will result to any party by extending the deadline as requested.

4. Plaintiffs, through their counsel, have assented to this Motion.

Respectfully submitted,

Defendants Barry Cadden, Lisa Conigliaro Cadden,
Gregory Conigliaro, Douglas Conigliaro, Carla
Conigliaro, and Glenn A. Chin,

By their Attorneys,

/s/ Daniel E. Tranen

Geoffrey M. Coan, BBO # 641998

Daniel E. Tranen, BBO # 675240

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28 State Street, 24th Floor

Boston, MA 02109-1775

Date: January 25, 2013

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

In accordance with Local Rule 7.1(a)(2), I, Garrett D. Lee, do hereby certify that I conferred with Plaintiff's counsel regarding Defendants' Assented To Motion for an Extension of Time to March 31, 2013 to Respond to the Plaintiff's Complaint.

Dated: January 25, 2013

/s/ Garrett D. Lee

Garrett D. Lee

CERTIFICATE OF SERVICE

I, Daniel E. Tranen, hereby certify that on January 25, 2013, the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Daniel E. Tranen
Daniel E. Tranen